

EXHIBIT A

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
3:24-CV-00137-RJC-DCK

CMT USA, Inc. and CMT Utensili S.p.A.,

Plaintiffs,

v.

Apex Tool Group LLC and Apex Brands, Inc.,

Defendants.

DECLARATION OF MARK BASANTA

I, Mark Basanta, declare as follows:

1. I am counsel at the law firm of Haug Partners, LLP, counsel for CMT in this matter.
2. I am over the age of 18, have personal knowledge of the statements below, and am competent to testify to them.
3. I attended the meet-and-confer videoconferences between the Parties on October 15 and 18, 2024.
4. During the October 15th meet and confer, CMT offered to (i) designate Lucia Spallacci's testimony as Rule 30(b)(6) testimony on Topic 27, and (ii) update its answer to Interrogatory 13, which covers similar subject matter as Topic 27.
5. Also during the October 15th meet and confer, Apex agreed to accept an updated response to Interrogatory 13 in lieu of further Rule 30(b)(6) testimony.
6. During the October 18th meet and confer, Apex stated that CMT's updated answer to Interrogatory 13 was insufficient.

7. Also during the October 18th meet and confer, CMT confirmed that its answer to Interrogatory 13 was complete and that it would not produce another Rule 30(b)(6) witness to testify on Topic 27.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: November 13, 2024

/s/ *Mark Basanta*

Mark Basanta